FROM INAME & LOCATION.

M.R. Foresman - W.G.K.

147 969 94/7:

September 4, 1973

P.E. Heisler G.A. Hippe

SUBJECT

East-West Gateway Environmental Task Force - Regional WTP Recommendations

REFERENCE

TO : D.C. Otto

Sara Wilson's review of the environmental assessment for the MERTA treatment plant was fairly accurate with the exception of her interpretation of the industrial waste problem. Comments are as follows:

- 1. Each primary plant will provide storm water treatment and overflow with modifications which are included as part of the regional grant application. Illinois regs allow the discharge of wastewater in combined systems in excess of plant capacity if it receives primary treatment and disinfection.
- Sauget sludge will contain metal hydroxides and will be landfilled in a landfill which is located out of the flood plain.
- 3. Both East St. Louis and Sauget effluents will exceed the 750 ppm over background TDS standard. Illinois regs allow TDS up to 3500 ppm if caused by pollution abatement practices. Environmental assessment states that "It should be noted, however, that a significant portion of the dissolved solids results from pollution abatement practices and that the level would be reduced with source treatment of the wastes containing iron. In no event did the level of dissolved solids in the treatability study exceed 3500 mg/l.
- 4. Municipal ordinances will be enacted requiring all dischargers of wastewaters containing materials which pass through or are not effectively treated in the treatment plants to be removed at their source.
- 5. The contingency that was suggested by Ms. Wilson is too restrictive and is not justified by the material contained in the environmental assessment. Only those industrial wastes which cause the Regional Treatment Plant to exceed effluent standards should be required to install "at source" treatment. If all of the industries were required to have "at source" treatment the regional treatment plant would not operate. Of the 37 MGD average flow into the regional

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system, approximately 50% is industrial. If all of the industrial waste was treated at the source, the remaining municipal waste would be diluted to the point where a biological treatment system would not operate.

If a contingent approval is necessary, an acceptable alternate is as follows:

.... This endorsement be contingent upon the enactment of local ordinances necessary to insure that all wastewaters which contain materials which, alone or in combination with other wastewaters, effect the operation of the regional treatment plant or cause its effluent to exceed the allowable standards will receive pre-treatment prior to discharge into the regional system.

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M.R. Foresman

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